

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

WILLIAM MATHIS, et al.,

Plaintiffs,

v.

U.S. PAROLE COMMISSION, et al.,

Defendants.

Civil Action No. 24-1312 (TNM)

**DEFENDANTS' MOTION TO DISMISS**

Pursuant to Federal Rule of Civil Procedure 12, Defendants, by and through undersigned attorneys, hereby moves to dismiss Plaintiffs' Complaint.

In support of this motion, Defendants respectfully refer the Court to the accompanying memorandum of points and authorities and a proposed order.

\* \* \*

Dated: June 25, 2024  
Washington, DC

Respectfully submitted,

MATTHEW M. GRAVES, D.C. Bar No. #481052  
United States Attorney

BRIAN P. HUDAK  
Chief, Civil Division

By: /s/ Kartik N. Venguswamy  
KARTIK N. VENGUSWAMY  
D.C. Bar #983326  
Assistant United States Attorney  
601 D Street, NW  
Washington, D.C. 20530  
(202) 252-1790  
kartik.venguswamy@usdoj.gov

*Attorneys for the United States of America*